March 6, 2006

Ms. Poonum Agrawal
Office of Electricity Delivery and Energy Reliability, OE-20
Attention: EPACT 1221 Comments
U.S. Department of Energy
Forestall Building, Room 6H-050
1000 Independence Avenue, S.W.
Washington, DC 20585

Submitted by e-mail to: EPACT1221@hq.doe.gov

Re: Considerations for Transmission Congestion Study and Designation of National Interest Electric Transmission Corridors, Notice of Inquiry and Request for Comments, 71 Fed. Reg. 5660 (February 2, 2006)

Dear Ms. Agrawal:

I. Executive Summary

The nation needs an infusion of investment in new electric transmission facilities. Congress recognized this in enacting new Section 219 of the Federal Power Act. As stated by the Edison Electric Institute ("EEI"), capital spending in transmission must increase by twenty five percent, or one billion dollars annually, to assure system reliability and to accommodate wholesale electric markets. The Department of Energy ("DOE" or "Department") has stepped forward to tackle one of the most important provisions of the 2005 Energy Policy Act, the designation of National Interest Electric Transmission Corridors ("NIETC"). The companies of the American Electric Power System (collectively "AEP")[1] applaud the DOE for its prompt positive actions in promoting this national policy. In these comments, AEP offers suggestions on how the DOE's proposals can be strengthened and focused to achieve the necessary goal – reducing congestion and increasing reliability – by building the interstate transmission superhighway necessary to power the American economy in the 21st century.

The intent of the 2005 Energy Policy Act is to get transmission sited more expeditiously if it is indeed determined that transmission is the right solution. The DOE will play a critical role in this process by creating the rules and process by which NIETCs are identified, selected, and designated. To accomplish this, the DOE should leverage procedures that were developed under the auspices of the Federal Energy Regulatory Commission ("FERC") to help facilitate open policies and evaluate situations and problems. Given the need to provide timely relief to congested areas, AEP offers the

[1]AEP Texas North Company, AEP Texas Central Company, Appalachian Power Company, Columbus Southern Power Company, Indiana Michigan Power Company, Kentucky Power Company, Kingsport Power Company, Ohio Power Company, Public Service Company of Oklahoma, Southwestern Electric Power Company, Wheeling Power Company, and AEP Transmission Company, LLC.

following five-step plan to maximize the efficiency and effectiveness of the NIETC designation process.

- First, the DOE should identify cut planes, or interfaces that exhibit significant congestion or reliability issues. The DOE plans to accomplish this with the services of CRA and input from individual TOs, RTOs, or any other appropriate industry participants. Once justified by its studies, DOE should designate each of those geographic areas a national interest electric transmission corridor ("NIETC") thereby providing the FERC with the authority to issue construction permits under appropriate circumstances.

- Second, established regional planning bodies such as RTOs or ISOs should determine the optimal solution to alleviate congestion in the area identified by the DOE. Transmission owners or other entities may also identify solutions for early consideration and expedited treatment at this step to resolve significant and obvious reliability and congestion problems.

- Third, if new transmission is the solution and the transmission route does not already fall within a previously designated NIETC, then the DOE should designate a broad corridor encompassing the transmission solution as an NIETC. The corridor should be broadly defined to allow sufficient alternative routing of the proposed solution during the federal, state and local processes defined in the next steps. The corridor should be broad enough at this stage as to not require environmental impact statements ("EIS") at this level. Any EIS should be conducted in the next steps.

- Fourth, state and local agencies should be fully engaged with the transmission developer at this step to comply with siting requirements as specified in the applicable laws and regulations, including any necessary EIS. To the extent possible, environmental assessments should be conducted at this stage in order to narrow the broadly defined corridor to specific alternate routes. For federal land and similar actions (i.e., land where state and local requirements do not apply), the process should engage the FERC as lead agency to employ their already robust and similar siting processes used to determine proper routes for gas pipelines.

- Fifth, as a last resort for state and local processes, FERC should use its backstop siting authority as defined in the Energy Policy Act of 2005, after "full and complete" applications are made to state and local siting authorities. However, "full and complete" applications must employ reasonable, efficient and explicit requirements that are for the public good and not made to simply delay the siting process.

AEP believes this multi-step process is a clear, open, and well defined method to expedite siting transmission that is in the national interest with due respect to federal, state and local requirements, including the environment. This process also places the

environmental assessments at the level where they will address needs, requirements and issues within the specific alternative routes.

AEP also believes that the DOE should delegate siting immediately after corridor designation to the proven siting processes employed by the FERC. The delegation is immediate for alternative routes across federal land and across land where state and local requirements do not apply. Where state and local processes are applicable, delegation of siting authority will be made to FERC with its backstop authority after the statutory period as defined in the Energy Policy Act has passed.

AEP supports eight draft criteria created by the DOE. AEP suggests when evaluating criteria for the NIETCs that DOE also focus on the long-term stability of any corridor it designates, because these corridors will be operational and relied upon for decades. The DOE should also leverage existing transmission facilities when designating corridors. This will help to quickly solve congestion problems while minimizing costs and environmental impacts.

Finally, areas where reliability issues or congestion is obvious should receive the earliest and most expeditious designation as an NIETC without more detailed calculations or further studies that only serve to delay the solution or confirm the obvious.

II. Background

On February 2, 2006, the Department of Energy released a Notice of Inquiry regarding the designation of NIETCs. The notice was issued pursuant to Section 1221(a) of the Energy Policy Act of 2005 ("EPAct"), which requires the Secretary of Energy to conduct a study on electric transmission congestion and issue a report that may designate "any geographic area experiencing electric energy transmission capacity constraints or congestion that adversely affects consumers as a national interest electric transmission corridor." Once an area has been designated as a NIETC, FERC may then issue permits for the "construction and modification of electric transmission" in the NIETC.

AEP is an electric utility holding company system providing electric service to customers in parts of eleven states. As the pioneer of 765 kV transmission facilities, AEP has experienced many of the obstacles that need to be overcome before new transmission can be built. For instance, it has taken AEP 14 years to site the Wyoming – Jacksons Ferry line, a much-needed 765 kV transmission line to serve West Virginia and Virginia. This line, originally proposed to be in service in 1998, will be completed in June 2006. In the interim period, AEP developed an automatic load-shedding plan to drop up to 1,000 MW of load to avoid an uncontrolled blackout in anticipation of heavy power flows and outages on the system. Fortunately, even after arming the load-shedding system in anticipation of a critical outage, it was not used and an outage did not occur. The United States economy deserves a better interstate transmission system and an expedited, but responsive siting process.

III. General Comments

The intent of the EPAct is to get transmission sited more expeditiously for reliability and congestion if it is indeed determined that transmission is the right solution. AEP applauds the DOE for promptly beginning the process to establish rules for the designation of NIETCs. As the lead government agency for the NIETC process the DOE will play a critical role in its implementation. The DOE will be required to designate cut planes and NIETCs broadly enough to allow these corridors to grow as conditions change over time. The DOE should work with various types of transmission organizations ("TOs") to determine whether new transmission is the best solution to alleviating congestion.

To help the DOE implement the new NIETC process more easily AEP suggests that the DOE should adopt several of the policies, procedures, and directives established by FERC. Specifically, the establishment of RTOs and ISOs has greatly improved the process of regional planning for new facilities to addressing specific reliability problems. We recommend that the DOE leverage the well-established planning processes used by RTOs and ISOs to determine the proper solution for alleviating congestion in DOE identified areas. Given the need to provide timely relief to congested areas, AEP suggests the use of the following five-step plan to designate NIETCs and site transmission:

- Problem Identification and DOE Delegation Stage – First, the DOE should designate cut planes, or interfaces with significant congestion or reliability issues. This is the easiest way to place the problem on a map. These interfaces can be identified through input from individual TOs, RTOs, or any other appropriate industry participants. An EIS or public hearings are not necessary and should not be conducted at this stage. Preparing an EIS before there are alternative routes would not be time well spent, and conducting public hearings before transmission is selected as the best solution to the congestion would be unnecessary. As permitted under the statute, DOE should designate NIETCs at this step as justified by its studies. At this point, the DOE should delegate siting authority to FERC for federal land or land where state and local requirements do not apply, and as a backstop authority for state and local processes.

- Solution Identification Stage – Second, the determination of whether new transmission is the right solution should be made by an open and timely stakeholder process, an individual TO, or any other knowledgeable body, including any interested state agency. All well established RTOs and ISOs have the procedures and expert staff necessary to carry out an open and transparent evaluation of the alternatives to determine whether transmission is the best solution to alleviate congestion. DOE should rely on these RTO and ISO established planning processes to develop the optimal solution to the problem identified in the first step. Transmission owners or other entities may also identify solutions for early NIETC consideration and expedited treatment at this step to resolve significant reliability and congestion problems.

- Additional Corridor Designation Stage – Third, if additional transmission is recommended in the Solution Identification Stage and the proposed solution falls outside a previously designated NIETC, then the DOE should designate a broad corridor or set of broad corridors where the transmission line is proposed from the previous step, then delegate siting authority to FERC (similar to the first step in this process). The corridor should be broadly defined to allow sufficient alternative routing of the proposed solution during the federal, state and local processes defined in next steps. The corridor should also be broadly defined so as not to require an EIS at this level. Any EIS should be conducted in the next steps.

- Siting Process – Fourth, state and local agencies should be fully engaged with the transmission developer at this step to comply with siting requirements as specified in the applicable laws and regulations, including any necessary EIS. The environmental assessments should be conducted at this stage in order to narrow the broadly defined corridor to specific alternate routes. For federal land or land where state and local requirements do not apply, the process should engage the FERC as lead agency to employ their already robust and similar siting processes used to determine proper routes for gas pipelines.

- FERC Backstop Authority – Fifth, as a last resort for state and local processes, FERC should use its backstop siting authority as defined in the EPAct after "full and complete" applications are made to state and local siting authorities. However, "full and complete" applications must employ reasonable, efficient and explicit requirements that are for the public good and not made to simply delay the siting process.

AEP believes this multi-step process provides a clear, open and well defined method of expediting the siting of transmission that is in the national interest and provides due respect to federal, state and local requirements, including the environment. This process also places the environmental assessments at the level where they will address needs, requirements and issues within the specific alternative routes. Once these broad corridors are narrowed to specific routes, applicable rules and regulations can then be effectively applied.

AEP also believes that the DOE should delegate lead agency authority to the proven siting processes employed by the FERC. The delegation is suggested to be immediate for alternative routes across federal land or land where state and local requirements do not apply, and immediate, following the statutory period defined in the EPAct, as backstop authority for state and local processes.

IV. DOE Congestion Study Questions

1. Should the Department distinguish between persistent congestion and dynamic congestion, and if so, how?

Yes, the DOE should distinguish between "persistent" and "dynamic" congestion. This is part of the Problem Identification and DOE Delegation Stage. Once a problem area is identified through TO input, RTO input, etc., the DOE should then be able to identify the cut planes necessary to alleviate the congestion.

The DOE's priority should be to identify persistent transmission constraint locations by identifying those transmission paths (in market areas) for which there has been a high Locational Marginal Price ("LMP") differential over a number of recent peak load seasons. In market and non-market areas, frequent Transmission Loading Relief ("TLR") events resulting in curtailment of transactions would provide another indication of persistent congestion. The megawatt-hours ("MWHs") curtailed and number of tags curtailed may also be used to identify the level of congestion. In non-market areas, a persistent transmission constraint can be identified by quantifying the amount of long-term firm transmission service that was denied for which there was little or no posted Total Transfer Capability ("TTC") or Available Transfer Capability ("ATC"). In these non-market areas, a high denial rate accompanied by a low (or zero) posted ATC must both be observed over a number of recent peak load seasons. For example, a zero firm ATC for the majority of a peak period but a comparatively high TTC could be the result of the transmission path being fully utilized but fully adequate for the activity. Conversely, a low TTC with a high denial experience for long-term firm transmission service would likely be an indicator of persistent congestion.

2. Should the Department distinguish between physical congestion and contractual congestion, and if so, how?

It is not clear what the Department means by "contractual congestion." One might assume that such congestion is related to limitations imposed by financial transactions. If that is the case, such limitations may or may not be related to real physical limits on the transmission system's capability to reliably transfer power and energy. The distinction between these two different types of congestion should be made at the Solution Identification Stage. If the problem is purely contractual, then building new transmission will not be the best solution to alleviating the congestion. However if the congestion is caused by physical constraints, then the stakeholders may decide that building new transmission is the best solution to alleviating congestion.

3. Appendix A lists those transmission plans and studies the Department has under review. In addition to those listed in Appendix A, what existing specific transmission studies and other plans should the department review? How far back should the Department look when reviewing transmission planning and path flow literature?

The DOE should review any proposal introduced during the Problem Identification Stage. This will ensure that all congestion areas are identified and reviewed to determine the best solution to alleviate the congestion.

Appendix A is a reasonably comprehensive listing for the Eastern Interconnection. However, similar transmission assessments for East Central Area Reliability Counsel ("ECAR"), Mid America Interconnected Network Reliability Counsel ("MAIN"), and Southwest Power Pool ("SPP") should also be added. Although, the DOE needs only go back two or three years in reviewing past literature and transmission assessments.

4. What are the categories of information that would be most useful to include in the congestion study to develop geographic areas of interest?

A. <u>Categories of Information</u>

Corridor designations should be made through the stakeholder process and then recommended to the DOE. There are several categories of information that would be useful to include during this process. These include:

- North American Electric Reliability Counsel ("NERC") or Electric Reliability Organization ("ERO") reliability standards,
- NERC and Regional reliability assessments,
- Quantification of the magnitude of long-term firm transmission service denials,
- Historical LMP prices between various resource and load areas for market areas,
- TTC and ATC values for non-market areas,
- Electric hub prices where there were no organized markets,
- TLR history,
- Reliability Must Run ('RMR") contracts,
- Operation performance/procedure reports from RTOs and individual utilities,
- Power transfer patterns,
- Reports on local and regional disturbances,
- Population growth trends,
- Penetration of new technologies in consumption or supply (e.g., distributed generation, plug in hybrid autos, consumer electronics, etc.),
- Prices of various fuels and their relative use in generation,
- Climate trends,
- Concentrations of aging generation susceptible to retirement,
- Barriers to new generation technology, fuel diversity, environmentally friendly generation or renewables,
- Market studies conducted by independent RTOs/ISOs

B. Transmission Studies

When studying regional transmission assessments stakeholders need only review data from the past two or three years. Any constraints from these assessments that are over three years old may already have been addressed through incremental transmission enhancements and/or generation additions.

V. Evaluation of DOE Criteria

A. General Comments on Criteria

AEP agrees with the types of questions asked by DOE and the evaluation criteria established by DOE to help identify general areas that may require NEITC designation. As previously discussed, the DOE should identify areas with a significant amount of congestion or reliability issues. After this identification, these areas should be referred to regional planning boards to select the best solution for alleviating the congestion. When creating the criteria for the identification and selection of NIETCs, the DOE should consider that both the DOE and the regional planning boards might use these criteria. Thus the criteria should be developed taking both of these groups into account. Areas where reliability issues or congestion is obvious should receive the earliest and most expeditious designation as an NIETC without more detailed calculations or further studies that only serve to delay the solution and confirm the obvious.

The corridors should not be designated at the level of a specific right-of-way ("ROW") location. Instead, corridors should be broadly defined to allow flexibility to consider alternative routes within jurisdictional processes, but not so broad as to hamper focused siting efforts. We envision broad corridors as miles wide instead of hundreds of feet wide. These broad corridors will then be narrowed down to specific transmission routes in the later stages of the process.

Finally, and certainly not least, NIETCs must be established to maintain national reliability standards that will be established by the ERO designated by FERC, and must take into consideration national security due to the nation's reliance on electric transmission infrastructure.

B. Comments on DOE Proposed Criteria

Draft Criterion 1: Action is needed to maintain high reliability. **Maintaining high electric reliability is essential to any area's economic health and future development. Accordingly, an area would be of interest for possible NIETC designation if there is a clear need to remedy existing or emerging reliability problems.**
Metrics: **A definition of the affected area in terms of load, population, and demand growth; a description of the expected degree of improvement in reliability associated with a proposed project; if appropriate, identification existing or projected violations of NERC Planning Criteria TPL–001, –002, –003, or –004.**

The ability of the transmission system to reliably serve a load area is a fundamental requirement for the nation's economy and for national security. In all cases, all load areas must be able to be served under a single contingency situation at projected peak load. As the load area under consideration increases in size, the transmission system should be able to continue to serve the load under more severe conditions. For example, a transmission system supplying a city of 50,000 people should be able to continue to supply this load following the unexpected outage of any single transmission element. However, if the load area under consideration contains several million people, the ability to withstand the unexpected unavailability of two or more transmission facilities or the loss of an entire right-of-way may be appropriate. In addition, an over-reliance on local generation resources to maintain transmission adequacy should be minimized. There must be a reasonable balance between local generation and the dependence upon transmission to serve a load area.

DOE should designate a broad set of corridors that will enable corridors to grow as the needs of a particular area change. The metrics needed to maintain high levels of reliability should go beyond measuring load and population impacted. A measure of equipment loss-of-life should also be included since EHV equipment can be severely damaged before any load is lost. Such a condition jeopardizes reliability by setting the stage for cascading outages as well as extended restoration times. To maintain reliability, the equipment must be operated within its capability and within the operating standards defined by NERC or the ERO.

Draft Criterion 2: Action is needed to achieve economic benefits for consumers. **An area may need substantial transmission improvements to enable large economic electricity transfers that would result in significant economic savings to retail electricity consumers.**
Metrics: **Estimates, based on transparent calculations and data, of the aggregate economic savings per year to consumers over the relevant geographic areas and markets. A demonstration of expected reduction in end-market concentration and how economic benefits for consumers would be affected.**

This is a valid criterion. For example, PJM's analyses indicate that transmission congestion has added about $1 billion to consumer cost during 2005. However, areas where reliability issues or congestion is obvious should receive the earliest and most expeditious designation as an NIETC without more detailed calculations or further studies that only serve to delay the solution or confirm the obvious.

Draft Criterion 3: Actions are needed to ease electricity supply limitations in end markets served by a corridor, and diversify sources.
Metrics: **Areas that are dependent on ''reliability-must-run'' plants would benefit from targeted improvements, in terms of enhanced reliability, reduced costs, or both. Similarly, areas that are highly dependent on specific generation fuels could economically benefit from supply diversification. Estimate the likely magnitude of such benefits, showing calculations.**

Generally no load area should depend upon any single generating unit or generating station to ensure adequate supply reliability. The transmission system should be able to accommodate various generation dispatches including the temporary or permanent outage of any single generation plant or unit. Where reliability must run units are needed to maintain minimum acceptable reliability, society as a whole may be accepting higher cost, for units that may not be economically viable. In some cases, where the must-run unit may not be environmentally friendly, society will have to endure environmental damages, when more environmentally friendly generation resources may be available but cannot be delivered due to transmission limitations. Therefore, significant load areas that require a particular generation facility to be operating during peak periods should be designated as NIETCs to ensure adequate transmission is constructed to remove the dependency upon this single facility and allow for more flexible use of local generation as well as access to more distant generation resources.

Draft Criterion 4: Targeted actions in the area would enhance the energy independence of the United States.
Metrics: **Provide calculations showing how specific actions aided by designation as an NIETC would increase fuel diversity, improve domestic fuel independence, or reduce dependence on energy imports. Quantify these impacts, including possible impacts on U.S. energy markets.**

Renewable resources such as wind and hydro that are typically remotely located away from load centers can play a role in diversifying U.S. fuel supply. In addition, conventional fueled resources (coal and nuclear) that use domestic fuels could also have socio-political benefits and reduce dependence on imported fuels. Such resources are also typically located at some distance from large population centers. In all of these cases, transmission infrastructure improvements will be needed to enable a better energy position in the United States and to enable retirement of older, economically and environmentally challenged generating plants. Greater transmission transparency is the enabler of a better energy position for the United States.

Draft Criterion 5: Targeted actions in the area would further national energy policy.

If properly applied, this criterion has merit. For example, this criterion could be used to encourage transmission development that would level the playing field for new generators to enter the market and compete head to head with incumbent generators that are located “downstream” of a constrained transmission interface. Consequently, a transmission reinforcement plan must be assessed on its ability to integrate any potential generation resources. A reasonably accessible transmission infrastructure is critical to allow fair and robust competition among alternative generation resources. Again, a more transparent interstate transmission system is the enabler of a better energy position for the United States.

Draft Criterion 6: Targeted actions in the area are needed to enhance the reliability of electricity supplies to critical loads and facilities and reduce vulnerability of such critical loads or the electricity infrastructure to natural disasters or malicious acts. Metrics: **For this criterion, relevant metrics would be case-specific.**

This is a valid criterion that could apply not only to individual critical loads, such as a major military installation, but also to concentrated population centers. The load centers located in the northeastern and mid-Atlantic portions of the Eastern Interconnection are highly dependent upon relatively few transmission corridors. Additional high capacity corridors would result in a more robust transmission system that would provide access to diverse generation resources and would improve the ability to withstand natural disasters and/or willful destructive acts.

Draft Criterion 7: The area's projected need (or needs) is not unduly contingent on uncertainties associated with analytic assumptions, e.g., assumptions about future prices for generation fuels, demand growth in load centers, the location of new generation facilities, or the cost of new generation technologies.

A robust transmission system should allow for various generation resource dispatches, fuels, and resource locations. Any assessment of these alternatives should determine the ability of the transmission system to reliably deliver power under various resource assumptions. As an example, a specific technique to accomplish this objective, as part of the transmission system analysis would be the inclusion of transmission reliability margin when evaluating transmission needs. However, the wide variety of assumptions could lead to paralysis of analyses, and must be reasonable to enable timely results.

Draft Criterion 8: The alternative means of mitigating the need in question have been addressed sufficiently.

This criterion should be used by the regional planning body in determining the best solution to address a congested transmission interface. When making comparisons of alternatives to the construction of new transmission and judging the relative merits, the entire range of attributes of the competing alternatives should be evaluated. As an example, if new generation were being compared to new transmission, the flexibility of the transmission project to satisfy other future needs, such as connecting new loads or generators along its path, and loss savings must be considered and weighed in the final decision. Additionally, the value of a new transmission project in releasing uneconomic reliability must run ("RMR") generation should also be taken into account.

C. Other Criteria the DOE Should Use in Making a NIETC Designation

When creating corridors the DOE should look beyond an areas immediate need and plan for the future. Designated corridors and associated reinforcements should be planned to last for decades, so that they are not outdated before they are placed in service. Thus, criteria for designating corridors should not be too narrowly prescriptive.

Designated corridors should also take advantage of the existing EHV transmission infrastructure. This will allow new corridors to quickly serve congested areas, by leveraging existing EVH foundation, while minimizing costs and environmental impact.

Finally, corridors should be designed to account for scale economies and for re-development of existing corridors for higher voltage transmission. For example, one 765 kV line is equivalent to 3-500 kV, 5-345 kV or 30-138 kV lines (based on surge impedance loading characteristics). The single 765 kV line would be less expensive and cause far less environmental impact than any of the equivalent groups of lower voltage facilities. Furthermore, NIETCs should provide for transmission development that would enable the ability to connect newer technology, environmentally friendly, and fuel diverse generating plants, and to enable the full potential of renewable resources. NIETCs should also anticipate intermediate tap stations near load centers to address load growth and market efficiency needs, as well as relieve future congestion.

VI. Proposal for Expedited NIETC Designation of the AEP I-765 Corridor

On January 31, 2006, AEP submitted a proposal to the DOE for a 765 kV transmission line from the Amos substation in West Virginia, through the Doubs substation in Maryland and ending at the Deans substation in New Jersey. AEP is currently working with PJM to get this transmission line included in PJM's regional transmission expansion plan ("RTEP") process to determine final terminations and related infrastructure needs. AEP requests that DOE designate this proposed line as a NIETC as early and expeditiously as possible because 1) it was previously identified by PJM in their "Project Mountaineer" announcement as a one of the corridors needed to relieve congestion, 2) the designation will be geographically broad enough to cover any PJM RTEP revisions to the plan, and 3) the reliability need and congestion relief is abundantly obvious in our request of January 31, 2006, citing benefits from our own studies, PJM congestion, and a Maryland Public Service Commission report. Any delays in this line will continue to expose millions of consumers to high electricity costs and jeopardize basic reliability needs of the Mid-Atlantic and surrounding states.

VII. Conclusion

AEP offers some practical suggestions to improve the effectiveness and efficiency of the NIETC designation process by taking advantage of existing facts, expertise, and processes. AEP believes that DOE's initiative is critical to the national agenda of achieving energy independence and providing a fair and robust platform for economic development in the nation. AEP respectfully submits the above suggestions to support DOE in achieving this very important national agenda, and we believe our position as the largest transmission owner in the United States, including over 2,000 miles of efficient and reliable 765 kV interstate transmission warrants due consideration.

Respectfully Submitted,

Electronically Filed
Craig Baker